

LITE DEPALMA GREENBERG & AFANADOR, LLC

Joseph J. DePalma
Jeremy N. Nash
570 Broad Street, Suite 1201
Newark, NJ 07102
Telephone: (973) 623-3000
Facsimile: (973) 623-0858
jdepalma@litedepalma.com
jnash@litedepalma.com
Local Counsel for Lead Plaintiff
Dr. Stanley Golovac

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, Individually and	:	
on behalf of all others similarly situated,	:	Civil Action No.: 18-2293-GC-RLS
	:	
<i>Plaintiff,</i>	:	CONSOLIDATED ACTION
	:	
v.	:	
	:	
RIOT BLOCKCHAIN, INC. F/K/A,	:	LEAD PLAINTIFF'S NOTICE OF
BIOPTIX, INC., JOHN O'ROURKE,	:	MOTION FOR LEAVE TO FILE
JEFFREY G. MCGONEGAL, BARRY	:	[PROPOSED] CONSOLIDATED THIRD
HONIG, CATHERINE DEFRANCESCO,	:	AMENDED CLASS ACTION
MICHAEL BEEGHLEY, JOHN STETSON,	:	COMPLAINT FOR VIOLATIONS OF
MARK GROUSSMAN, ANDREW	:	THE FEDERAL SECURITIES LAWS
KAPLAN, MIKE DAI, JASON LES, and	:	
ERIC SO,	:	
	:	
<i>Defendants.</i>	:	

PLEASE TAKE NOTICE that on June 6, 2022 at 10:00AM, or as soon thereafter as counsel may be heard, Lead Plaintiff will move before Honorable Georgette Castner, U.S.D.J., at the United States District Court for the District of New Jersey, Clarkson S. Fisher Federal Building and Courthouse, Room 5050, 402 East State Street, Trenton, New Jersey, for an Order pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, granting leave to file a Third Amended Complaint.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiff will rely upon the accompanying memorandum of law and Declaration of Joseph J. DePalma. A proposed form of Order is also submitted herewith.

LITE DEPALMA GREENBERG & AFANADOR, LLC

Dated: May 9, 2022

/s/ Joseph DePalma

Joseph J. DePalma
Jeremy N. Nash
570 Broad Street, Suite 1201
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Facsimile: (973) 623-0858
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jnash@litedepalma.com

*Local Counsel for Lead Plaintiff
Dr. Stanley Golovac*

MOTLEY RICE LLC

William S. Norton (Admitted *pro hac vice*)
Joshua C. Littlejohn (Admitted *pro hac vice*)
Christopher C. Moriarty (Admitted *pro hac vice*)
28 Bridgeside Boulevard
Mt. Pleasant, SC 29464
Telephone: (843) 216-9000
Facsimile: (843) 216-9450
bnorton@motleyrice.com
jlittlejohn@motleyrice.com
cmoriarty@motleyrice.com

*Counsel for Lead Plaintiff Dr. Stanley Golovac
and Lead Counsel for the Class*

US MARKET ADVISORS LAW GROUP PLLC

David P. Abel
5335 Wisconsin Ave. NW, Ste. 440
Washington, D.C. 20015
Telephone: (202) 274-0237
Facsimile: (202) 686-2877
dabel@usmarketlaw.com

Counsel for Lead Plaintiff Dr. Stanley Golovac

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send a Notice of Electronic Filing to all counsel of record.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

**LITE DEPALMA GREENBERG
& AFANADOR, LLC**

Dated: May 9, 2022

/s/ Joseph DePalma

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